

ALLEN & OVERY LLP

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Opposition date: April 25, 2017

*Attorneys for Defendant ABN AMRO Bank N.V.
(presently known as The Royal Bank of Scotland
N.V.)*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ABN AMRO BANK N.V. (presently known as
THE ROYAL BANK OF SCOTLAND, N.V.),

Defendant.

Adv. Pro. No. 10-05354 (SMB)

**NOTICE OF MOTION OF ABN
AMRO BANK N.V. (presently known
as THE ROYAL BANK OF
SCOTLAND, N.V.) FOR LEAVE TO
APPEAL FROM THE
BANKRUPTCY COURT'S ORDER
CONCERNING RBS/ABN'S
MOTION TO DISMISS BASED ON
EXTRATERRITORIALITY**

PLEASE TAKE NOTICE that ABN AMRO Bank N.V. (presently known as The Royal
Bank of Scotland, N.V.) ("RBS/ABN"), moves, pursuant to 28 U.S.C. §158(a)(3) and Rule 8004

of the Federal Rules of Bankruptcy Procedure, for leave to appeal the March 3, 2017 Order of the Bankruptcy Court [ECF No. 117] in the above-captioned adversary proceeding (the “Motion”), supported by RBS/ABN’s Memorandum of Law in Support of Motion for Leave to Appeal From the Bankruptcy Court’s Order Concerning RBS/ABN’s Motion to Dismiss Based on Extraterritorially and the accompanying Declaration of Michael S. Feldberg.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States District Court for the Southern District of New York; (iii) specify the name of the objecting party and state with specificity the basis of the objection(s) and the specific grounds therefor; (iv) be filed in accordance with the electronic filing procedures for the United States District Court for the Southern District of New York and (v) be served upon counsel to RBS/ABN, Allen & Overy LLP, 1221 Avenue of the Americas, New York, New York 10020, Attn: Michael S. Feldberg, Esq., so as to be received no later than **April 25, 2017**.

Dated: April 11, 2017
New York, New York

Respectfully submitted,

ALLEN & OVERY LLP

By: /s/ Michael S. Feldberg
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